

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

UNITED STATES OF AMERICA

v.

Criminal No. 2:18-cr-00261

JUANITA CARRIE HAYNES

**RESPONSE BY THE UNITED STATES TO THE COURT'S ORDER TO INQUIRE
ABOUT DEFENDANT'S MEDICAL CONDITION AND STATUS**

Comes now the United States, by Kristin F. Scott, Assistant United States Attorney for the Southern District of West Virginia, and responds to this Court's December 29, 2021, Order asking that the United States inquire with the Bureau of Prisons as to the medical condition and status of Juanita Carrie Haynes ("Defendant"). *See* ECF No. 112.

Defendant is currently serving a 108-month sentence at FPC Alderson. ECF No. 110. On or about December 23, 2021, Defendant moved for compassionate release and requested to be released to home confinement or supervised release. ECF No. 109. As grounds therefore, Defendant cited several medical conditions, including COPD, hypertension and recent renal issues, which Defendant stated are risk factors for COVID-19. ECF No. 110.

FPC Alderson currently has approximately eighty-six inmates who are positive for COVID-19. *See* BOP: COVID-19 Update, <https://www.bop.gov/coronavirus/> (entry for FPC Alderson) (last visited Dec. 29, 2021). Defendant is one of those inmates—she tested positive for COVID-19 on December 15, 2021, when she was evaluated by Health Services and reported that it felt as if "something heavy was on her chest." Exhibit A at 41. Defendant refused a COVID-19 Pfizer-BioNTech COVID-19 vaccination on January 20, 2021. *Id.* at 116.

Defendant was transferred to Greenbrier Valley Medical Center (“GVMC”) in Ronceverte, West Virginia, on December 19, 2021. Exhibit A at 29. There, she received medical treatment for pneumonia due to COVID-19—the treatment included oxygen, steroids, and fluid. Defendant was discharged the same day. *Id.*

It appears that Defendant was again hospitalized in the Intensive Care Unit (“ICU”) at GVMC on or about December 23, 2021. Exhibit A at 9. On December 25, 2021, Defendant could not eat and received oxygen via a non-rebreather. Exhibit A at 8. On December 26, 2021, ICU staff intubated Defendant and placed her on a ventilator. Exhibit A at 6. An ICU nurse requested to contact Defendant’s family and set up a visit. *Id.* Defendant’s vitals were stable. *Id.* A health services nurse spoke with Defendant’s daughter and assisted in coordinating arrangements for Defendant’s daughter to visit at GVMC. *Id.*

Defendant’s vitals have notably decreased in recent days. On December 27, 2021, she was unable to maintain an oxygen saturation percentage above fifty percent once she was rotated onto her back by ICU staff. Exhibit A at 5. Defendant’s oxygen saturation decreased with repositioning and suctioning. *Id.* On December 27, a GVMC ICU charge nurse told a BOP Health Services nurse, “she’s not doing very well at all, vent dependent on max settings.” Exhibit A at 4. Defendant’s family was updated on her condition. *Id.*

On December 28, 2021, Defendant remained on the ventilator with very low blood oxygen saturation levels of approximately forty to fifty percent. Exhibit A at 3. It is noted that “if she makes it over the next few days she will need a trach [sic] long term.” *Id.* A GVMC ICU nurse told BOP Health Services that Defendant’s blood oxygen saturation continues to drop, even when her head is turned. *Id.* Chest X-ray shows severe pneumonia. *Id.* Defendant’s family was called and updated on her condition. *Id.*

As of this filing, December 29, 2021, Defendant remains on the ventilator. Exhibit A at 1. Her blood oxygen saturation levels continue to drop with repositioning of her body. *Id.* She remains on sedation and paralytics at GVMC. *Id.*

At present time it appears that Defendant is receiving significant health care that BOP is paying for. The United States has been informed that should Defendant be released, financial responsibility for her bill will fall to her and her family.

Respectfully submitted,

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing “RESPONSE BY THE UNITED STATES TO THE COURT’S ORDER TO INQUIRE ABOUT DEFENDANT’S MEDICAL CONDITION AND STATUS” has been electronically filed and service has been made on Defendant, through her attorney, by virtue of electronic filing this 29th day of December, 2021:

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